



**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE**

**JOHN DOE,**

*Plaintiff,*

**v.**

**William Lee, Governor of the State  
of Tennessee, in his official capacity;**

**And,**

**David Rausch, Director of the Tennessee  
Bureau of Investigation, in his official  
capacity.**

*Defendants.*

**Civil Action No: 3:23-cv-1187**

**Judge Trauger**

**PLAINTIFF'S MOTION TO PROCEED UNDER PSEUDONYM  
AND FOR PROTECTIVE ORDER**

Plaintiff John Doe hereby moves the Court for permission to proceed in this action under the pseudonym "John Doe 1187" and to enter a protective order barring the disclosure of his true name or other information that identifies him or his family members, directly or indirectly and requiring that any documents containing such information be redacted or filed under seal. Courts "may excuse plaintiffs from identifying themselves in certain circumstances" where "a plaintiff's privacy interests substantially outweigh the presumption of open judicial proceedings." *Doe v. Porter*, 370 F.3d 558, 560 (6th Cir. 2004).

In support of this motion, Plaintiff relies upon his supporting memorandum and the record in this case. Plaintiff has already provided his true name to Defense Counsel with the agreement that it will remain confidential pending a ruling on this motion. In order to ensure that Defendants may litigate this matter without infringing Plaintiff's privacy concerns, Plaintiff